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draft

FAX

789-1921
789-1956
American Gilsonite Company, M/047/010
Bonanza Operations - "I-30" Revision

Review Comments - Anthony A. Gallegos 1-28-92

Original application (Form MR-1) approved in 1985. Original surety estimate does not clearly identify the disturbed acreage and number of mine sites. The approved surety was \$500,000.

ORIGINAL
Taken from the surety estimate: Facilities 26.5, Roads 43.8, Ponds-pads-reservoirs 23.2, Residential 2.3, Active mine sites 31.0 acres, TOTAL = 126.8 acres.

Taken from page 4 of the original MR-1 form: Mine site 27, Roads 43.8, Facilities 31.2, TOTAL = 102 acres. (ACREAGE TO BE DISTURBED)

Tabulated from pages 4b, 4c of the original MR-1 form: Mine sites 29.0, Residential & operating area 8.0, Roads 43.0, Plant & other 23.2, TOTAL = 103.2 acres.

Page 4c of the original MR-1 form lists 8.0 acres of townsite broken down into 2.3 acres of residential area and 5.7 acres of operating area.

Page 4a of the MR-1 form lists 33 mine sites.

Page 4b of the MR-1 form lists 29 mine sites with a total disturbed area of 29 acres.

The I-30 Revision describes the addition of one mine site with an estimated 2 acres of disturbance (Page 3 of submission). The Revision refers back to the original MR-1 form in response to a majority of the questions on the revision form. The Revision says the proposed mining area is within the boundary covered by the original permit application.

The 12-3-91 revision of page 4a of the MR-1 form lists 34 mine sites. One site has been reclaimed. Four mine sites have been added to this list (B-12, E-23, I-30, LE-7) which do not appear on the 1984 version of the same list. Three sites which were on the 1984 version (PW-5, PW-6, W-13) are not shown on the 1991 version. No acreage for the mine sites are included in this list.

The questions to be answered are: How many mine sites (or mine site disturbed acreage) does the original AGC reclamation estimate include? Is this new site (I-30) a special type of site which requires 1 acre more than the usual sites? (The revision calls for 2 acres of disturbance for one mine site.) • OTHER SITES ARE "PIGGY BACK" • NO NEED FOR A SEPARATE 1 ACRE ESCAPEWAY.

The page 4a current balance is 33 sites minus 3 sites (lost?) minus one site (reclaimed) plus 4 sites, equals 33 sites. What happened to the three sites which vanished from the listing? [PW-5, PW-6, & W-12 were all listed as Pre-development] The sites added to the list are Active (B-12, E-23), in Pre-Development (I-30), or Development (LE-7). Should these other "new" sites also be included in the revision since they were not on the original 1984 list?

- DOES REVISION DISTURBED ACREAGE INCLUDE NEW ROAD FROM I-15 TO I-30 SITE?

- NOPE, NO NEW ROAD

• PRE-DEVELOPMENT MENS PROPOSED, BUT NO DISTURBANCE YET
• DEVELOPMENT MENS CURRENTLY DISTURBED